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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey
corporation, d/b/a “My Forex Funds”; Traders
Global Group Inc., a Canadian business
organization; and Murtuza Kazmi,
Defendants.

Civil Action No. 3:23-cv-11808-ZNQ-TJB

**DECLARATION OF MICHAEL E.
SHAHEEN, III IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO
HAC VICE***

Michael E. Shaheen, III declares pursuant 28 U.S.C. § 1746 as follows:

1. I am an attorney-at-law in the District of Columbia and am a partner at Quinn Emanuel Urquhart & Sullivan LLP (“Quinn Emanuel”), counsel in this case for Traders Global Group Inc., a New Jersey corporation doing business as “My Forex Funds,” Traders Global Group Inc., a Canadian business organization, and Murtuza Kazmi. I am familiar with the proceedings in this matter. I make this certification in support of my application for the admission as counsel *pro hac vice* in this matter.

2. Pursuant to Local Rule 101.1, I certify that I am admitted to and in good standing of the following courts:

Courts of the District of Columbia

District of Columbia Bar
901 4th Street, NW
Washington, D.C. 20001
(202) 737-4700

Date Admitted: October 4, 2010

Courts of the Commonwealth of Virginia

Muriel-Theresa Pitney
Supreme Court of Virginia, Clerk's Office
100 North 9th Street, 5th Floor
Richmond, VA 23219

Date Admitted: October 16, 2009*

*currently inactive

3. I am a member in good standing of the Bars to which I am admitted. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction. I have not been convicted of a felony.


4. If admitted *pro hac vice*, I will conduct myself in accordance with the rules regulating and governing conduct of attorneys before this Court and will strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial and any other proceedings.

5. If admitted *pro hac vice*, I will make payment to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 and shall pay the sum of \$150.00 to the Clerk of the United States District Court in accordance with Local Civil Rule 101.1(c)(3).

6. For the foregoing reasons, I respectfully request that the Court enter an Order pursuant to Local Civil Rule 101.1(c) admitting me *pro hac vice* in this matter.

I declare under the penalty of perjury that the foregoing statements are true and correct.

Executed in Virginia on this 11th day of September 2023.



Michael Shaheen, III